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**From:** Julieanna Potter [jupotter@hilcorp.com]  
**Sent:** 8/12/2019 8:30:41 PM  
**To:** Pavitt, John [Pavitt.John@epa.gov]  
**CC:** Williams, Christopher [Williams.Christopher@epa.gov]  
**Subject:** RE: [EXTERNAL] Records Request, EPA Air Compliance Inspection of Hilcorp Alaska, MPU

Good Afternoon John,

I am in the process of compiling the information requested below and I was wondering if you could clarify request 2, "Please send me records of leak inspection at C-Pad and M-Pad (only)." Are you referring to surveys conducted at these pads in 2018, or alternatively all prior year's surveys? Additionally, would you like copies of all photographs and videos from these surveys?

Thank you,

Julieanna

**Julieanna Potter (Orczewska)**

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**From:** Pavitt, John [mailto:Pavitt.John@epa.gov]  
**Sent:** Friday, August 2, 2019 12:16 PM  
**To:** Julieanna Potter <jupotter@hilcorp.com>  
**Cc:** Williams, Christopher <Williams.Christopher@epa.gov>  
**Subject:** [EXTERNAL] Records Request, EPA Air Compliance Inspection of Hilcorp Alaska, MPU

Hello Julieanna. I'm sending this email to request records as part of the joint EPA/State of Alaska air compliance inspection on July 17, 2019 of the MPU facility. The inspection focused on compliance with New Source Performance Standards (NSPS), Subpart OOOOa. During the inspection we visited C-Pad and M-Pad with escort Mike Helms.

Thank you for emailing me on July 23<sup>rd</sup> with a copy of the *Fugitive Emission Monitoring Plan* and information about 3 leak locations placed on Delay of Repair at C-Pad. As you noted, the video clips you have for the 3 locations are large files and emailing them is difficult, so I've included those with my records request (below). During the on-site inspection Mike gave me a printout of the most recent *Annual Compliance Report*, covering calendar year 2018. The printout has margins which run off the page, so I'm also requesting a fresh copy of that as well.

Records Request:

1. Please send me a copy of the 2018 Annual Compliance Report.
2. Please send me records of leak inspections at C-Pad and M-Pad (only):
  - a. For new leaks identified during the inspection at C-Pad, confirm that the leaking components have been added to your tracking system and are on a schedule for repair.
    - i. Verify that the leaking components have been either tagged or documented with a digital photo showing the GPS coordinates.
  - b. For leaks placed on Delay of Repair in the *Annual Compliance Report* (2018):

- i. Daily inspection logs such as paper checklists used by your leak inspectors when the leaks were identified
  - ii. Photos and/or video of leaking components, showing GPS coordinates
  - iii. Photos of tags put onto leaking components
  - iv. Work orders related to repairing leaks
  - v. Follow up inspection records for all leaking components which have been repaired or replaced, and then resurveyed to verify they were no longer leaking.
- c. In the 2018 Annual Report, the report states that a leak was identified at B-Pad on 10/18/18, and successfully repaired on 11/19/18. Based on this information the repair took more than 30 days to complete. If you have any additional information about this repair and why it took more than 30 days to complete, please provide it.
- d. At M-Pad we observed two methanol storage tanks. Provide the date of construction, the storage capacity, and the Maximum True Vapor Pressure of the liquid stored in the tanks. These tanks may be subject to New Source Performance Standards, Subpart Kb.
- e. At M-Pad we observed two process heaters. Do these heaters produce steam? Please provide the date of construction and heat input capacity in million Btu/hr. These heaters may be subject to New Source Performance Standards, Subpart Dc.

I would appreciate receiving these records by Friday, August 16. Please let me know if you have any questions about this request.

Thank you again for the help Hilcorp provided during the on-site inspection and for information already provided.

Sincerely,

John Pavitt, Air Compliance Inspector  
Air and Toxics Enforcement Section  
U.S. EPA Region 10  
Alaska Operations Office  
Anchorage, AK  
Phone: (907) 271-3688

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